

WALTER S. CALWELL,
Attorney Named in Mortgage

vs.

WILLIAM OTIS LOVE and
ADELE L. LOVE, his wife

* IN THE CIRCUIT COURT
* FOR FREDERICK COUNTY
* In Equity
* No. 20,289

PETITION

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Petition of Walter S. Calwell, Attorney Named in Mortgage, Plaintiff, in this cause, by his Solicitors, Callahan and Calwell, respectfully represents:

1. That William Otis Love and Adele L. Love, his wife, the Defendants are now the record title owners of fee simple property situate in Frederick County, known as Lot 37-B, Carrollton Drive, having purchased said property by deed dated May 6, 1959 from Brosius Homes Corporation duly recorded among the Land Records of Frederick County, for the purchase price of \$10,100.00, which total purchase price was financed by a purchase money mortgage for \$10,100.00, executed, dated and delivered on May 6, 1959 to Baltimore Federal Savings and Loan Association and recorded among the Land Records of Frederick County in Liber E.C.W. 620 folio 319, and filed among the papers in this cause as "Plaintiff's Exhibit 'A'".

2. That said mortgage is in default for the non-payment of monthly payments of principal, interest and property expense due under said mortgage from August, 1962 to May, 1963, a period of ten months, representing a total arrearage of \$750.00, and the present unpaid principal indebtedness due on said mortgage is \$9,899.74.

3. That the payment of said mortgage was guaranteed by the Veterans Administration under the provisions of the Servicemens' Readjustment Act of 1944, as amended, the benefits of which Act were made available to William Otis Love, one of the Defendants herein, as an eligible war veteran, and that in connection with said default, the Baltimore Federal Savings and Loan Association, as present holder of the aforesaid mortgage, has filed a Notice of Intention to Foreclose with the Veterans Administration under the